

2311 RACING LLC d/b/a 23XI RACING,  
and FRONT ROW MOTORSPORTS, INC.,

V.

Defendants.

PUBLIC REDACTED VERSION

2. I reviewed joinder agreements signed for a previous transfer in 2021.

3. As I stated in my previous declaration (Dkt. 52-2 ¶¶ 7–11), [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. Defendants state in their brief that they believe we “manufactured” the new circumstances that are the basis for our renewed motion. For 23XI, Defendants write that [REDACTED] [REDACTED] “sent remarkably similar emails” (Dkts. 52-15 and 52-16) and say that suggests a “coordinated effort behind the scenes” implying that [REDACTED] [REDACTED]. This is completely false. To the extent the letters are similar, I believe it is because [REDACTED] [REDACTED]. 23XI had no involvement at all.

5. 23XI's business will suffer significantly if our cars cannot race with chartered status. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

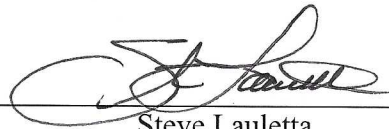
[REDACTED]

6. 23XI exists to compete at the highest level of stock car racing, striving to become the best team it can be. But that ambition can only be pursued within NASCAR, which has monopolized the market as the sole top-tier circuit for stock car racing. Our efforts to expand – purchasing more cars and increasing our presence on the track – are integral to achieving this goal. It is not hypocritical to operate within the only system available while striving for excellence and contending for championships. It is a necessity because NASCAR's monopoly leaves 23XI no alternative circuit, no different terms, and no other viable avenue to compete at this level.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of December 2024 in Huntersville, North Carolina.

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "S. Lauletta", is written over a horizontal line.

Steve Lauletta